

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TARAS KALUSH,)	
)	
<i>Petitioner,</i>)	
)	Case No. 23-cv-2316
v.)	
)	Honorable Matthew F. Kennelly
ZORIANA KALUSH,)	
<i>Respondent.</i>)	

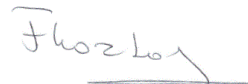
**RESPONDENT’S RESPONSE TO PETITIONER’S MOTION PURSUANT TO 22 U.S.C.
§9004**

NOW COMES the Respondent, ZORIANA KALUSH (hereinafter “ZORIANA”), by and through her attorneys, The Law Offices of Fedor Kozlov, P.C., and as and for her RESPONSE TO PETITIONER’S MOTION PURSUANT TO 22 U.S.C. §9004, states as follows:

1. ZORIANA does not oppose Petitioner’s request to surrender travel documents of the minor child to her attorney Fedor Kozlov. However, ZORIANA has recently applied for herself and for her daughter for asylum in connection with the war in Ukraine. ZORIANA retained services of an immigration attorney. ZORIANA’s application is currently pending. At some point in future ZORIANA might need to surrender her and her daughter’s travel documents to USCIS. When requested, ZORIANA would like to be able immediately produce to USCIS her and her daughter’s travel documents without any delay. ZORIANA will provide proper notice to Petitioner and this Court.
2. ZORIANA does not oppose Petitioner’s request not to renew or obtain travel documents for the minor child. However, as disclosed above, ZORIANA applied for asylum for herself and the minor child. Such application is currently pending and undetermined.

3. ZORIANA will provide location of the minor child and living situation and circumstances through her attorney. ZORIANA and her daughter are currently residing with ZORIANA's parents. The exact location will be provided separately.
4. ZORIANA does not oppose Petitioner's request. However, ZORIANA need clarification as to term "remove." Specifically, ZORIANA would like to be able to travel with the child outside of Eastern Division of the North District of Illinois for a short period of time for vocational purposes without specific permission of the Court. ZORIANA will provide a proper notice to the Petitioner.
5. ZORIANA does not oppose Petitioner's request, provided that such video calls would not interfere with the minor child's daily routine. ZORIANA submitted to the Petitioner minor child's daily schedule. Currently Petitioner is communicating with the minor child every Saturday and Sunday at 6pm Chicago time by zoom. The video calls are scheduled to last for 15 minutes. However, the Petitioner yet to be able to last for the entire period of the call. On each occasion Petitioner would terminate a call after approximately four (4) to nine (9) minutes. ZORIANA believes that having daily morning calls for thirty minutes would not be in the best interest of the minor child at this time. ZORIANA believes that appointment of a *Guardian ad Litem*, might resolve this issue. At this time Petitioner objects to the appointment of a *Guardian ad Litem*.
6. ZORIANA agrees with Petitioner's request that neither party shall disparage the other to the minor child.

Respectfully submitted,



Florz Lopez

Fedor Kozlov, Esq.
One of Respondent's Attorney's

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